

Claudette Torrez v. Signet Jewelers Limited

Case No.: 2:24-cv-01332-SMB

Index to Exhibits A-B to Declaration of Kacie Donovan in Support of Defendant's Motion to Dismiss Plaintiff's Complaint (Doc. 1)

Exhibit A Signet's Privacy Policy, posted publicly at <https://signetjewelers.com/privacy-policy/>, captured on August 25, 2024

Exhibit B Wayback Machine of Signet's Privacy Policy as it appeared on the webpage <https://signetjewelers.com/privacy-policy/> on or about January 27, 2023, captured on August 25, 2024

EXHIBIT A

Signet Jewelers Privacy Policy

Last Updated: August 3, 2023

At Signet Jewelers, we respect our customers' privacy. This privacy policy (the "Policy") describes how Signet brands Kay Jewelers, Kay Outlet, Jared The Galleria Of Jewelry, Zales, Zales Outlet, and Banter by Piercing Pagoda (collectively, "Signet," "we," or "us") collect, use, and disclose consumers' personal information, including information collected in our retail locations and through our Website (which include brands' websites, and all other websites, mobile sites, services, applications, platforms and tools where this Policy appears or is linked) (collectively, the "Services").

By providing information to us (by any means, whether in a store, in correspondence, via our Website or otherwise) you consent to our use of the information you provide in accordance with this Policy. If you do not agree with this Policy or our practices, please do not use our Services.

This Policy may change from time to time and is incorporated into our Website Terms of Use. Your continued use of our Website constitutes your acceptance of those changes. We encourage you to review this Policy periodically.

Notice at Collection

The following serves as our notice at collection ("Notice") of personal information in accordance with applicable law. We collect personal information as detailed in this Notice and in this Policy.

We may "sell" or "share" personal information as those terms are defined under applicable law, and as indicated for each relevant category of personal information below. If you would like to opt out of the sale or sharing of your personal information, you may do so by clicking the Do Not Sell My Information link on the footer of the Website.

We keep personal information as long as reasonably necessary or relevant for the practices described in this Policy. We also keep personal information as otherwise required by law. What this means in practice will vary among different types of information and our ongoing business or legal needs for the information, for example in relation to tax, health and safety, and potential or actual disputes or investigations.

We collect the following categories of personal information, including within the prior 12 months:

- ***Identifiers (including account information):*** This includes your name, postal address, email address, mobile or other telephone number, username and password if you register an account with us. We may collect information from partners that verify your identity using your mobile device for account log-in purposes. We also may collect content information you provide, including photos and comments, customer service inquiries, and related history that you share with us. This data will be sold or shared as described in more detail in our Policy.

- ***Any Personal Information Described in Subdivision (e) of Cal. Civ. Code Section 1798.80, including:***
 - **Demographic information.** This includes information you provide regarding your personal interests, date of birth, anniversary date, demographics, experiences with our products, and shopping and contact preferences. This data will be sold or shared as described in more detail in our Policy.
 - **Financial Account Information.** If you make a purchase from us, we collect payment-related information, depending on the form of payment you choose. This data will not be sold or shared.
 - **Information You Provide When You Apply for Credit.** This includes information you are required to provide when applying for credit, such as your name, postal address, email address, phone number, date of birth, and other information needed to assess your credit worthiness and verify your identity, including employment-related information and sensitive personal information, such as your social security number. With the exception of employment-related information and sensitive personal information, this data will be sold or shared as described in more detail in our Policy.
 - **Information You Provide about a Third Party.** If you send someone else a communication from the Services, such as sending an invitation to a friend, the information you provide (e.g., name, e-mail address) will be used to facilitate the communication. This data will be sold or shared as described in more detail in our Policy.
 - **Information You Provide Through Social Media.** You may also be given the option to link to your social media account through the Services. When you do, we may automatically receive certain information about you based on your registration and privacy settings on those third party services. This may include name, user name, demographic information, protected classifications under California or federal law, education information, professional or employment-related information, updated postal address or contact information, location, interests, and publicly-observed data, such as from social media and online activity. With the exception of protected classifications under California or federal law, education information, and professional or employment-related information, this data will be sold or shared as described in more detail in our Policy.
- ***Characteristics of Protected Classifications under California or Federal Law:*** This includes your age, gender, and marital status. This data will not be sold or shared.
- ***Commercial Information:*** This includes purchase, return, wish list and transaction information, as well as media consumption, previous purchases, shopping habits, loyalty program information, and lifestyle preferences. This data will be sold or shared as described in more detail in our Policy.
- ***Internet or other Electronic Network Activity Information (including usage and technical information):*** This includes information about your use of the Services, including your Internet Protocol (“IP”), unique device identifier, device characteristics, system settings and preferences, search queries, referring URLs, and the time and date of your usage. We also collect and store information about your preferences, how you interact with our Services, and how you interact with emails that we send to you. We may link certain data elements we have collected, such as your browser information, with other information we have obtained about you. This data will be sold or shared as described in more detail in our Policy.

- **Geolocation Data:** This includes information about the location of the devices used to access the Services ("Location Data"). Location Data includes: (a) the location of the mobile device or tablet derived from GPS or WiFi use; (b) the IP address of the mobile device or tablet or internet service used to access the Services; and (c) other information made available by a user or others that indicates the current or prior location of the user, such as geotag information in photographs. This data will be sold or shared.
- **Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information:** This includes such information when you use our Service's virtual try-on features. In addition, we may collect information in relation to your interactions with our virtual jewelry consultants and, at select retail locations, information derived from your mobile device that we deidentify and aggregate for "heat mapping" to help us understand how users interact with our stores. This data will be sold or shared as described in more detail in our Policy.
- **Professional or Employment-related Information:** This includes information you provide regarding your professional interests, occupation, and income. This data will not be sold or shared.
- **Education Information:** This includes information you provide in relation to your education. This data will not be sold or shared.
- **Inferences Drawn from the Above:** We collect profile inferences that we draw from your information and web activity to create a personalized profile so we can better identify goods and services that may be of interest to you. This data will be sold or shared.
- **Sensitive Personal Information:** This includes information needed to assess your credit worthiness and verify your identity, such as your social security number. We require this information to process your application. Moreover, we collect information relating to your racial origin, religion, and sexual orientation. This data will not be sold or shared.

What are the purposes for which we collect and use your personal information?

We may use the personal information that we collect for a variety of business purposes, including:

- To provide the Services to you;
- To process and track orders and otherwise fulfill your requests;
- To respond to comments, questions, or concerns;
- To prevent and detect fraud and other unlawful activity, claims and other liabilities;
- To alert you about a product safety announcement or recall or correction of an offer, promotion, or advertisement;
- To verify and validate your identity to reduce credit risk and manage collections;
- To carry out our obligations and enforce our rights; and
- To comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies.

We may also use the personal information we collect for the following commercial purposes:

- To improve or develop new services and product offerings, including for warranty usage;
- To identify, offer, and contact you with personalized content and advertising, including newsletters, articles, product;
- To customize or personalize your shopping experience;

- To validate or update the information we collect from or about you;
- To alert you about new products or services, savings awards, event invitations, and other information;
- To conduct market research, surveys, and similar inquiries to help us understand trends and customer needs across product categories or customer groups;
- To enroll you in loyalty or other programs, and enter you into sweepstakes and promotions or contact you regarding a contest prize;
- To notify you of changes to our Services or any products or services we offer; and
- For marketing and promotional purposes.

Additional Purposes:

- We may also use information you provide to us for other purposes as disclosed at the time you provide your information or otherwise with your consent.

1. Sources of Information We Collect

When information identifies or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household, we refer to it as “personal information.”

There are several ways we may obtain personal information about you, including through (A) information you provide to us directly; (B) information that we automatically collect; and (C) information we receive from third parties. This includes data that identifies you personally whether directly (i.e., your name) or indirectly (i.e., information associated with the device you use online). For further information on the personal information we collect, please refer to the Notice at Collection above.

A. Information You Provide

We collect personal information about you, as described in the Notice at Collection above, via the Services, including online, offline, at our retail locations and by telephone.

B. Information Automatically Collected

Whenever you visit our online Services, we and our third-party advertisers and service providers (see Section 2.B below for more detail), may use a variety of technologies such as cookies and similar technologies to automatically or passively collect certain information about your online activity.

We may link certain data elements we have collected through automated means, such as your browser information, with other information we have obtained about you for the purposes described in the Notice at Collection above, and to let us know, for example, whether you have opened an email we sent to you. While you can change your cookies settings in your browser, without cookies, you may not be able to use all of the features of our Website.

C. Information Collected From Third-Party Sources

We collect information about you from ad networks, data companies, data brokers, and other third-party sources with whom you may not have a direct relationship, and that help us provide ads and services that target your interests. The information collected includes, for example, your demographic

information, media consumption, previous purchases, shopping habits, loyalty program information, lifestyle preferences, or information to validate or update the information we collect from or about you.

D. *Aggregate or Deidentified Information*

We may aggregate or deidentify any personal information we collect. We may share the aggregated or deidentified information with our business partners and service providers, and we may use such information for our own purposes. We will maintain and use deidentified information in deidentified form, and will not attempt to re-identify that information.

2. Information We Disclose

A. *Disclosure of Information by You*

We offer many ways to find, enjoy, and share content, including by filling out surveys, reviewing and rating products or services, inquiring about or purchasing products or services, participation in online communities, “liking” or “sharing” our content to your social media accounts .

Any information you disclose on publicly-facing areas of our Services or on other third-party websites becomes public information. Please exercise caution when disclosing personal information in these public areas.

B. *Disclosure of Information by Us*

We have sold or shared the categories of personal information identified in the Notice at Collection above:

- With vendors and advertising partners who help us reach you with ads that are tailored to your interests, as described under “Interest-Based Advertising Choices” below.
- With analytics partners, who help us understand your use of our Services.
- With our family of companies, such as our various brands identified at the outset of this Policy, and our other affiliated companies. We share personal information within this family of companies for business, operational, promotional and marketing purposes.
- With partners who help provide a better customer site experience.
- To partners in co-branded relationships such as advertisers that provide products and services or rewards programs. We may share information with these third parties if you participate in a co-branded, co-sponsored, or jointly presented promotion, contest, survey, voting feature, or service.

We disclose personal information:

- To service providers that provide business, professional or technical support functions for us (including fulfilling and shipping orders), help us operate the Services, or administer activities on our behalf.
- If we are required to do so by law or court order, to enforce or apply our Terms of Use or if we believe in good faith that such release is necessary or appropriate to protect the rights, property, or safety of our company, customers, affiliates (i.e., brands with common ownership, interest, or control), or others.

In addition, we may aggregate or deidentify personal information and use or disclose the aggregated/deidentified information for marketing, analytics, and other purposes.

Finally, we may disclose personal information in connection with the sale, transfer, acquisition, merger, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change or ownership or control by Signet or any affiliated company (in each case, whether in whole or in part). When one of these events occurs, we will use reasonable efforts to require the recipient to use personal information in a manner consistent with this Policy.

3. Interest-Based Advertising Choices

We may collect information about your use of the Services to provide you with advertising about products and services tailored to your individual interests. We also may obtain information for this purpose from third-party websites on which our ads are served. You may see our ads on other websites or apps because we use third-party ad networks to serve our ads.

The networks use this information to show you advertisements that may be tailored to your individual interests. The information our ad networks may collect on our behalf includes data about your visits to websites that serve our advertisements, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our Website and other online Services, and on third-party websites that participate in these ad networks. This process also helps us track the effectiveness of our marketing efforts.

To learn more about interest-based advertising, and to opt out of the use of your information for such advertising by the Digital Advertising Alliance (DAA) participating companies, please visit <http://optout.aboutads.info>.

To opt out from the use of information about your online activities for interest-based advertising by Network Advertising Initiative (NAI) member companies, please visit <http://optout.networkadvertising.org>.

To opt-out of the use of your mobile device ID for targeted advertising, please see <http://www.aboutads.info/appchoices>.

If you wish to prevent your data from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

You can also control how some information is collected through your browser or mobile device. You can adjust your browser settings to limit or block certain cookies, but this may prevent us from storing your preferences and may make some features of the Services inoperable. Refer to your browser's help menu for further details. On your mobile device, you may also adjust your privacy and advertising settings to control whether you want to receive more relevant advertising. You may need to set these preferences on each browser or device you use.

4. Other Choices About the Use of Your Personal Information

Mailing Lists. You can unsubscribe from receiving our emails by following the "Unsubscribe" link provided in our emails. If you receive marketing communications from one or more brands or affiliates, you should opt-out individually from each of the affiliates

from which you are receiving brand-specific marketing communications. Opting out of communications does not affect our communication with you via telephone or email regarding your orders or other sales or service transactions.

5. How We Protect Personal Information

We use technical, administrative, and procedural measures to help protect your personal information. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us.

6. Children's Privacy

We are committed to protecting the privacy of children. The Services are not directed to children and we do not knowingly collect any personal information from children. If a child under the age of 16 has provided us with personal information online, we ask that a parent or guardian please contact us, and we will take reasonable steps to delete personal information provided by the child. We do not knowingly collect or sell the information of anyone under 16 years of age.

7. Do Not Track Policy

Some browsers have a “do not track” feature that lets you tell websites that you do not want your online activities tracked. At this time, the Websites do not respond to web browser “do not track” requests or similar signals that users may employ.

Individuals can opt out of processing for profiling and targeted advertising purposes by emailing [privacy\[at\]signetjewelers.com](mailto:privacy[at]signetjewelers.com). Signet will honor individuals’ opt-out preferences.

8. Links to Third Party Sites and Services

Our Website and online Services may contain links to third party websites (including social networks and related plugins) operated by individuals or companies unrelated to us. Please be aware that we are not responsible for the privacy practices of such third party websites. We provide links to these websites for your convenience only, and you access them at your own risk. We recommend that you review the privacy policies and terms of use posted on such third party websites before using them.

Our Website and online Services may also offer you the ability to interact with plugins from social media sites, which may allow us and/or the social media site to receive data from or about you. In some cases, we may know that you clicked on a social plugin, such as a Twitter Follow button, or receive other information from the social media sites. Similarly, if you have previously provided personal information to a third-party operating a plug-in on this Website or another of our online Services, then that third-party may recognize you on our Website or other online Services. Your use of social network plugins is subject to each social media site’s own privacy policy, so please read that site’s policies carefully to understand its practices. As with linked sites, we have no control over and are not responsible for the information that is collected, stored, or used by social network plugins.

9. Retention of Personal Information

We keep personal information as long as reasonably necessary or relevant to achieve the purpose described in this Policy. We also keep personal information as otherwise required by law. What this means in practice will vary between different types of information, and when we consider our approach we take into account ongoing business or legal needs for the information, for example in relation to tax, health and safety, and potential or actual disputes or investigations.

10. Your State-Specific Privacy Rights

If you are a California, Colorado, Connecticut, Virginia, or Utah resident, you may take advantage of the following privacy rights:

- **Right to Know:** You have the right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.
- **Right to Delete:** You have the right to delete personal information that we have collected from you. Note that there are some reasons we will not be able to fully address your request, such as if we need to complete a transaction for you, to detect and protect against fraudulent and illegal activity, to exercise our rights, for our internal purposes, or to comply with a legal obligation.
- **Right to Correct:** You have the right to correct inaccurate personal information that we may maintain about you, subject to appropriate verification.
- **Right to Opt-Out of the Sale or Sharing of Personal Information:** You have the right to opt-out of the “sale” or “sharing” of your personal information, as such terms are defined under state privacy law. This means that, if you opt out, going forward, we will not sell or share your personal information with such third parties to use for their purposes, including cross-context behavioral advertising, unless you later direct us to do so.
- **Right to Opt-Out of Targeted Advertising:** You have the right to opt-out of targeted advertising. Opting out does not mean that you will stop receiving ads, it just means that those ads will not be targeted based on your personal information.
- **Right to Appeal:** If we deny your request, and you wish to appeal, you may appeal our decision.

Use and Disclosure of Sensitive Personal Information: To the extent that we collect, use, or share “sensitive personal information” as that term is defined under applicable law, we limit our use or disclosure of the sensitive personal information for permitted business purposes.

How to Submit a Request

To take advantage of your rights, please contact us by email at [privacy\[at\]signetjewelers.com](mailto:privacy[at]signetjewelers.com), by phone at 1-800-527-8029 or use this [link](#) to submit your request. We may request certain information about your interactions with Signet to verify your identity before we can respond to your access, deletion, correction, or portability requests. Signet will confirm receipt of your request within 10 business days and will respond to your request within 45 calendar days, after proper verification, unless we need additional time, in which case we will let you know.

To take advantage of your right to opt out of the sale or sharing of personal information or to opt out of targeted advertising, please click on the Do Not Sell or Share My Personal Information link on our Website footer or email us at [privacy\[at\]signetjewelers.com](mailto:privacy[at]signetjewelers.com). We will work to comply with your opt-out request within 15 business days. You may also use an authorized agent to submit a request to opt out on your behalf if you provide the authorized agent signed written permission to do so.

Nevada residents may use the email address above to submit a verified request to direct us to stop the sale of your covered information.

We value your privacy and will not discriminate in response to your exercise of your privacy rights.

Agent Requests

You may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents will need to demonstrate that you've authorized them to act on your behalf or must demonstrate they have power of attorney pursuant to applicable probate law. Signet retains the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent's identity. An authorized agent is prohibited from using a consumer's personal information, or any information collected from or about the consumer, for any purpose other than to fulfill the consumer's requests, for verification, or for fraud prevention.

11. Locations; Data Transfers

Signet is based in the United States. This Website and our other online Services are intended for use only by persons located in the United States. We make no claims that the Website, online Services or any of the contents thereof are accessible or appropriate outside of the United States. Access to the Website or online Services may not be legal by certain persons or in certain countries. If you access the Website or online Services from outside the United States, you do so on your own initiative, at your sole risk, and you are responsible for compliance with all applicable laws.

12. Modifications to this Policy

Any changes we may make to our Privacy Policy will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy. If you do not agree or consent to these updates or changes, do not continue to use our Services. If we make a material change to this Privacy Policy, we will provide notice to you as required by law.

In addition to this Privacy Policy, there may be specific campaigns or promotions which will be governed by additional privacy terms or policies. We encourage you to read these additional terms or policies before participating in any such campaigns or promotions as you will be required to comply with them if you participate.

13. Branded Credit Card Privacy Policy

This Policy does not govern the collection or use of the information provided in connection with our branded credit cards. If you have one of Signet's branded credit cards, a separate privacy policy provided to you by the credit provider describes collection, use, and protection of information about you and your account.

14. Notice of Financial Incentive

Signet brands offer Rewards Programs, which include Vault Rewards. If you choose to participate in a Rewards Program, we will provide certain benefits, such as discounts and rewards for your purchases. We will also ask you to provide personal information, such as your name, phone number, and email address, when you sign up for the Rewards Program. We use this information in connection with our provision of free or discounted products and services. As a result, our Rewards Programs may constitute a "financial incentive" under California law. The value we derive from collecting personal information through Rewards Programs is related to the value of benefits we provide Vault Rewards Program participants, minus the costs of administering the programs.

[Click here](#) to learn more about Vault Rewards and to enroll now. You can withdraw from a Rewards Programs at any time after you join. Please contact our Customer Care Team at 1-800-527-8029 or via Live Chat to withdraw.

15. How to Contact Us

If you have any questions or concerns about this Privacy Policy or the practices described herein, please contact us or send mail to:

Signet Jewelers - Privacy Rights

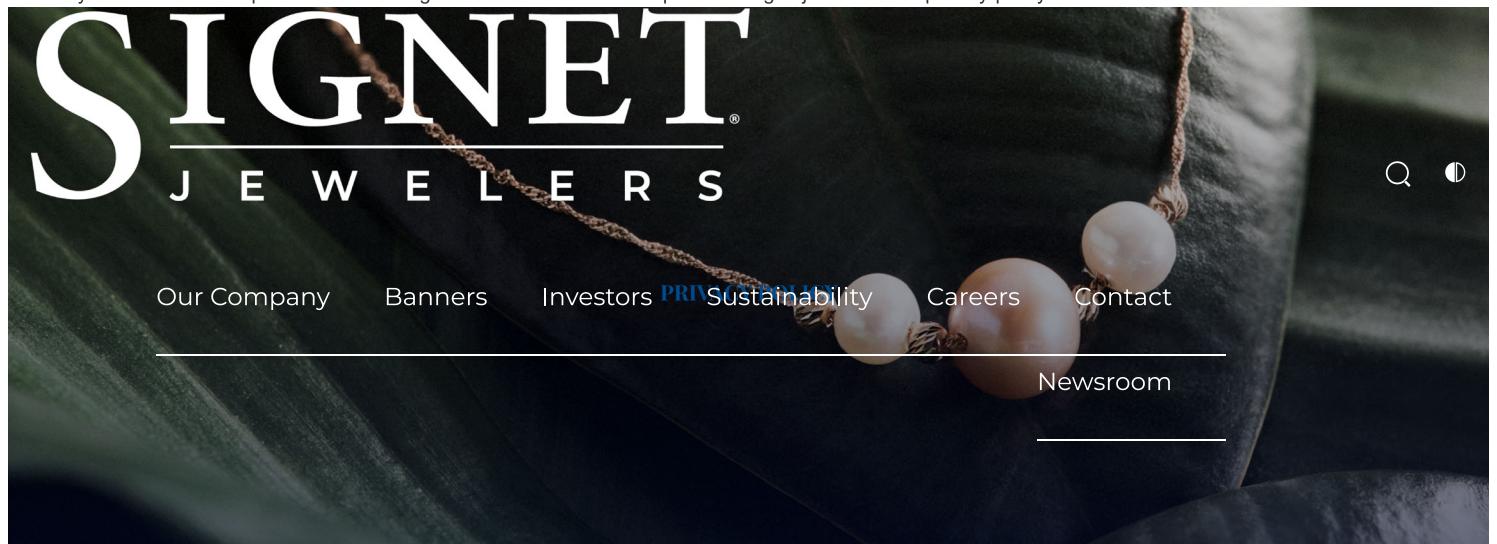
Legal Department

375 Ghent Road

Akron, OH 44333

privacy[at]signetjewelers.com

EXHIBIT B



Last revised December 30th, 2019 For California Privacy Rights Click [Here](#)

At Signet Jewelers ("Signet"), we respect our customers' privacy. Signet operates worldwide under name brands including Kay Jewelers, Jared The Galleria Of Jewelry, Zales, Zales Outlet, and Piercing Pagoda. This privacy policy ("Policy") applies to all Signet activities, including, but not limited to our retail locations, brands' websites, and all other websites, mobile sites, services, applications, platforms and tools where this Policy appears or is linked (collectively, our "Website"). This Policy is to inform you about how we collect, use, share, and protect personal information. By providing information to us (by any means, whether in a store, in correspondence, via our Website or otherwise) you consent to our use of the information you provide in accordance with this Policy. Any reference to our Website includes its e-mail, text, live chat, and other electronic messages. If you do not agree with this Policy or our practices, you may not use our Website. This Policy may change from time to time and is incorporated into our Website Terms of Use. Your continued use of our Website constitutes your acceptance of those changes. We encourage you to review this Policy periodically.

Information We Collect

There are several ways we may obtain information about you, including through (A) information you provide to us directly; (B) information that we automatically collect; and (C) information we receive from third parties. This includes data that identifies you personally whether directly (i.e., your name) or indirectly (i.e., information about your online use).

A. Information You Provide

We collect personal information about you in various ways, online, offline, and by telephone. The types of personal information we may collect include:

- **Information You Provide When You Interact with the Website.**

- We collect your name, postal address, email address, mobile or other telephone number, username and password if you register an account with us.
- We collect content information you provide, including photos and comments.
- We collect customer service inquiries, and related history that you share with us.
- We collect information you provide regarding your personal or professional interests, date of birth, anniversary date, demographics (such as gender, occupation, income and marital status), experiences with our products, and shopping and contact preferences.
- We also may collect information about the location of the devices used to access the Website ("Location Data"). Location Data includes: (a) the location of the mobile device or tablet derived from GPS or WiFi use; (b) the IP address of the mobile device or tablet or internet service used to access the Website; and (c) other information made available by a user or others that indicates the current or prior location of the user, such as geotag information in photographs. If you do not want us to collect Location Data from your device, please delete the app or disable the location settings on your device or tablet. Note, however, that disabling the location setting may affect your ability to access and use that app.

- **Information You Provide When You Make a Purchase.** If you make a purchase from us, we collect a credit/debit card number and related financial information (such as CVV, expiration date, and billing address), or other payment information (such as via PayPal or Apple Pay), depending on the form of payment you choose. We also collect purchase, return, wish list and transaction information.

- **Information You Provide When You Apply for Credit.** You may also be required to provide certain information when you apply for credit. We and the credit provider may be required to collect some information, including: your name, address, email address, phone number, date of birth, and other information needed to assess your credit worthiness and verify your identity, such as social security number and employment-related information. We require this information to process your application. If you choose to link to a credit provider's or other third party site, they may have privacy policies that differ from our own, and we are not responsible for the practices of such sites. You therefore should refer to their privacy policies to understand how they collect and handle your information and what kinds of choices you have.

- **Information You Provide about a Third Party.** If you send someone else a communication from the Website, such as sending an invitation to a friend, the information you provide (e.g., name, e-mail address) will be used to facilitate the communication.

- **Information You Provide Through Social Media.** You may also be given the option to link to your social media account through the Website. When you do, we may automatically receive certain information about you based on your registration and privacy settings on those third party services. This may include name, user name, demographic information, updated address or contact information, location, interests, and publicly-observed data, such as from social media and online activity.

B. Information Automatically Collected

Whenever you visit our Website, we, and certain third-party advertisers and service providers, may use a variety of technologies such as cookies, web beacons, pixels, log files, local shared objects (Flash cookies), HTML5 web storage, or other technologies to automatically or passively collect certain information about your online activity, such as the following:

- **Computer or Device Information.** We may automatically collect about your Internet Protocol ("IP") address or other unique identifier or information from the computer, mobile device, tablet or other device you use to access the Website, including but not limited to your IP address, unique device identifier, browser characteristics, domain and other system settings, search queries, device characteristics, operating system type, language preferences, referring URLs, actions taken on our site, dates and times of website visits, metadata and other information associated with other files stored on your device. Through these automated collection methods, we obtain "clickstream data," which is a log of the links and other content on which a visitor clicks while browsing a website. We may link certain data elements we have collected through automated means, such as your browser information, with other information we have obtained about you for the purposes described below, and to let us know, for example, whether you have opened an email we sent to you. While you can change your cookies settings in your browser, without cookies, you may not be able to use all of the features of our Website.
- **Usage Information.** We may use local shared objects to collect and store information about your preferences and how you interact with our Website, including the date and time of your visits, the areas or pages you visit, the amount of time you spend viewing or using the Website, the number of times you return to the Website, other click-stream or site usage data, emails that you open, forward or click-through to our Website, and other sites that you may visit. These technologies help us recognize you, customize or personalize your shopping experience, store items in your online shopping cart between visits, and analyze the use of our services and solutions to make them more useful to you. These technologies also allow us to aggregate demographic and statistical data and compilations of information, which may include personal information, and share this information with our business partners and service providers that provide products and services to us.

C. Information Collected From Other Sources

We may acquire information from other sources as follows:

- From other trusted third-party sources that selectively display ads based on browsing history. You can opt out of these services by clicking on the links below. The information collected includes, for example, your demographic information, media consumption, previous purchases, shopping habits, loyalty program information, lifestyle preferences, or information to validate or update the information we collect from or about you. For more information about your choices about ads displayed online please visit [AdChoices](#) and [NetworkAdvertising](#).
- From our partners and service providers (including, for example, business partners, analytics and other data vendors, advertising networks and search information providers).

How We Use the Information We Collect

We may use the information described above for the following business purposes:

- to provide our Website and its contents to you;
- to provide requested products and services;
- to process and track orders;
- to respond to comments, questions, or concerns;
- to prevent and detect fraud and other unlawful activity, claims and other liabilities;
- to alert you about a product safety announcement or recall or correction of an offer, promotion, or advertisement;
- to keep a record of our interactions with you;
- to verify and validate your identity to reduce credit risk and manage collections;
- to carry out our obligations and enforce our rights; and
- to comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies.

We may use the information described above for the following commercial purposes, and may seek consent prior to such use, depending on your jurisdiction:

- to improve or develop new services and product offerings;
- to identify, offer, and contact you with personalized content and advertising, including newsletters, articles, product, or service alerts, new product or service announcements, savings awards, event invitations, and other information;
- to conduct market research, surveys, and similar inquiries to help us understand trends and customer needs across product categories or customer groups;
- to enroll you in loyalty or other programs, and enter you into sweepstakes and promotions or contact you regarding a contest prize;
- to notify you of changes to our Website or any products or services we offer;
- for marketing and promotional purposes; and
- to ensure that your shopping experience is as easy and pleasant as possible.

In addition, we may use the information in other ways for which we describe at the time of collection.

Further, we may use information collected through cookies, web beacons, pixels, web server logs and other automated means for purposes such as (a) customizing our users' visits to our Website, (b) delivering content tailored to our users' interests and the manner in which our users browse our Website, and (c) managing our Website and other aspects of our business.

Additionally, if you use the Website to connect with third party services, you authorize us to use information from and about you, on your behalf, to interact with these third party services based on your requests. We may use third-party analytics services to help us and our providers and other relevant third parties analyze your use of our Website. [Click here](#) to learn about how to opt out and our partners participating in the Digital Advertising Alliance.

Interest-Based Advertising

On our Website, we may collect information about your online activities for use in providing you with advertising about products and services tailored to your individual interests. We also may obtain information for this purpose from third-party websites on which our ads are served. You also may see our ads on other websites because we use third-party ad networks to serve our ads.

We use such services to target our messaging to users through demographic, interest-based and contextual means. We may also use our own cookies to serve you such interest-based advertising. We can track your online activities over time by collecting information through automated means, including through the use of first and third-party cookies: web server logs, pixels and web beacons. The network may use this information to show you advertisements that may be tailored to your individual interest. The information our ad network may collect on our behalf includes data about your visits to websites that serve our advertisements, such as the times or advertisements you view and the actions you take on the websites. This data collection takes place both on our Website and on third-party websites that participate in these ad networks. This process also helps us track the effectiveness of our marketing efforts.

Understand your choices for receiving more relevant advertising provided on the Website or across other websites and online services, or to opt out, please review the information below:

- To learn more about such interest-based advertising, and to opt out of such collection and use for interest-based advertising by the Digital Advertising Alliance (DAA) participating companies, please visit <http://optout.aboutads.info>.
- To opt out from the use of information about your online activities for interest-based advertising by Network Advertising Initiative (NAI) member companies, please visit <http://optout.networkadvertising.org>.
- To opt-out of the use of your mobile device ID for targeted advertising, please see <http://www.aboutads.info/appchoices>.
- If you wish to prevent your data from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on available <https://tools.google.com/dlpage/gaoptout>.
- On your mobile device, you may also adjust your privacy and advertising settings to control whether you want to receive more relevant advertising.

Information We Share

We do not disclose personal information we collect about you, except as described in this Policy.

A. Sharing of Information by You

We offer many ways to find, enjoy, and share content. Your activity in connection with our Website may include filling out surveys, reviewing and rating products or services, inquiring about or purchasing products or services, participation in online communities, "liking" or "sharing" our content to your social media accounts or pages or otherwise interacting with our Website. Any information you may disclose on publicly-facing aspects of our Website or on other third-party websites becomes public information. Please exercise caution when disclosing personal information in these public areas.

B. Sharing of Information by Us

We may share personal information with the following:

- **Service providers** that provide business, professional or technical support functions for us (including to the extent necessary or desirable to fulfill or ship your order or complete your transaction), help us operate our business and the Website, or administer activities on our behalf. These service providers are permitted to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements. Examples of these service providers include entities that process credit card payments, manage and reduce our credit risk, verify information, fulfill orders, and provide web hosting, analytics and marketing services.
- **Our Family of Companies** such as our various brands identified at the outset of this Privacy Policy, and our affiliated company JamesAllen.com. We share personal information within this family of companies for business, operational, promotional and marketing purposes.
- **Co-Branded Relationships** such as advertisers that provide products and services or rewards programs. We may share information with these third parties if you participate in a co-branded, co-sponsored, or jointly presented promotion, contest, survey, voting feature, or service.
- **Aggregate or Anonymous Non-Personal Information** is information that cannot be used to uniquely identify or contact an individual person. We may collect, use, transfer, and disclose this non-personal information for any purpose, and which includes non-personal information that may be aggregated and used to help us provide more useful information to our customers and to understand usage of our Website.

We may release your personal information if we are required to do so by law or court order, to enforce or apply our Terms of Use or if we believe in good faith that such release is necessary or appropriate to protect the rights, property, or safety of our company, customers, affiliates, or others. We may also share or transfer information, including your personal information, in connection with the sale, transfer, acquisition, merger, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change or ownership or control by Signet or any affiliated company (in each case, whether in whole or in part). When one of these events occurs, we will use reasonable efforts to provide appropriate notice before information is transferred or becomes subject to different privacy practices.

How We Protect Personal Information

We use certain reasonable security measures to help protect your personal information. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us. You use our Website and provide us with your information at your own risk. If we share information with a third party, as detailed in this Privacy Policy, we shall use reasonable efforts to ensure that they keep the information secure and only use the information consistent with the terms of this Privacy Policy.

Choice/Opt-Out

Certain parts of our Website require cookies. You are free to set your browser or operating system settings to limit certain tracking or to decline cookies, but by doing so, you may not be able to use certain features through our Website or take full advantage of all of our offerings. Please refer to your Web browser's or operating system's website or "Help" section for more information on how to delete and/or disable your browser or operating system from receiving cookies or controlling your tracking preferences. On your mobile device, you may also adjust your privacy and advertising settings to control whether you want to receive more relevant advertising.

You can unsubscribe from receiving our emails by following the "Unsubscribe" link provided in our emails. We will honor your request to remove you from our mailing lists, but there may be a delay between submission of such request and actual removal from our mailing lists, as these lists are generated well in advance of our actual mailings. If you receive marketing communications from one or more brands or affiliates, you should opt-out individually from each of the affiliates from which you are receiving brand-specific marketing communications. Opting out of communications does not affect our communication with you via telephone or email regarding your orders or other sales or service transactions.

You may request access to the personal information we maintain about you or request that we correct, amend, delete or block the information by [contacting us](#). You may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your personal information, and we

will apply your preferences going forward. If you choose to delete your account information, we may still retain certain information for internal purposes and records-keeping, as well as to prevent fraud, solve disputes, and to comply with our Terms of Use or other policies, take actions we deem necessary due to technical and legal requirements, as well as dictated by constraints related to the security, integrity and operation of our Website.

Children's Privacy

We are committed to protecting the privacy of children. The Website is not directed to children and we do not knowingly collect any personal information from children. If a child under the age of 16 has provided us with personal information online, we ask that a parent or guardian please [contact us](#). Please visit the FTC website at www.ftc.gov for tips on protecting children's privacy online.

Do Not Track Policy

Some browsers have a "do not track" feature that lets you tell websites that you do not want your online activities tracked. At this time, the Websites do not respond to web browser "do not track" requests or similar signals that users may employ.

Consent

By providing information on or through a Website you are consenting to the collection, use and disclosure of such personal information as described in this Policy. You may withdraw your consent at any time by following the procedure described in the [Choice/Opt-Out](#) section above. In addition, your use of the Website constitutes consent (a) to be contacted about your account through any contact information you provide, including cell phone numbers, even if the number is on a Do Not Call list, and even if you are charged under your phone plan and (b) to the use of any automatic telephone dialing system and/or a prerecorded message when contacted.

Links to Third Party Sites and Services

Our Website may contain links to third party websites operated by individuals or companies unrelated to us. Please be aware that we are not responsible for the privacy practices of such third party websites. We provide links to these websites for your convenience only and you access them at your own risk. We recommend that you review the privacy policies and terms of use posted on and applicable to such third party websites prior to utilizing them.

Our Website may also offer you the ability to interact with social plugins from social media sites, which may allow us and/or the social media site to receive data from or about you. In some cases, we may know that you clicked on a social plugin, such as a Twitter Follow button, or receive other information from the social media sites. Similarly, if you have previously provided personal information to a third-party operating a plug-in on this Website, then such third-party may recognize you on our Website. Your use of social network plugins is subject to each social media site's privacy policy, which may be different from ours, so please read these policies carefully to understand their policies and your options. As with linked sites, we have no control over the information that is collected, stored, or used by social network plugins, and are not responsible for the practices of such sites.

Access and Retention

If you have a Website account, you can log in to view and update your account information. Please [contact us](#) with questions or concerns, to request edits to your personal information, or to have your personal information removed from our database. We keep your personal information for as long as we think is necessary or advisable, and we reserve the right to retain it to the full extent not prohibited by law.

Your California Privacy Rights

California residents may take advantage of the following rights:

- You may request, up to two times each year, that we disclose to you the categories and specific pieces of personal information that we have collected about you, the categories of sources from which your personal information is collected, the business or commercial purpose for collecting your personal information, the categories of personal information that we disclosed for a business purpose, any categories of personal information that we sold about you, the categories of third parties with whom we have shared your personal information, and the business or commercial purpose for selling your personal information, if applicable.
- You may request that we delete any personal information that we have collected from or about you. Note that there are some reasons we will not be able to fully address your request, such as if we need to complete a transaction for you, to detect and protect against fraudulent and illegal activity, to exercise our rights, or to comply with a legal obligation.
- You may request to opt out of Signet's sale of your personal information to third parties, and to our family of companies that do not share the same brand name, for their commercial purposes. This means that, if you opt out, going forward, we will not share your information with such third parties to use for their purposes unless you later direct us to do so. To effect the opt out, please click on the Do Not Sell My Information link on our website footer or submit a request in writing to the contact information below.

To take advantage of any of these rights, please visit this [link](#). If you have questions about how to take advantage of these rights, please call us at 1-800-220-5852. We value your privacy and will not discriminate in response to your exercise of your privacy rights. We will respond to your access and deletion requests within 45 days of receipt of your request, after proper verification, unless we need additional time, in which case we will let you know.

For purposes of compliance with the California Consumer Privacy Act, in addition to the further details as described throughout this Privacy Policy, we make the following disclosures:

- We collect the following categories of personal information: *Identifiers/Contact Information, Commercial information, Internet or other electronic network activity information, geolocation, visual and audio information, and inferences drawn from the above.*
- We sell the following categories of personal information: *Identifiers/Contact Information, Internet or other electronic network activity information, and inferences drawn from the above.*
- We disclose the following categories of personal information for a business purpose: *Identifiers/Contact Information, Commercial information, Internet or other electronic network activity information, geolocation, visual and audio information, and inferences drawn from the above.*

Locations; Data Transfers

The Company is based in the United States. This Website is intended for use only by persons located in the United States. We make no claims that the Website or any of its content is accessible or appropriate outside of the U.S. Use of this Website may not be legal by certain persons or in certain countries. If you access the Website from outside the United States, you do so on your own initiative, at your sole risk, and you are responsible for compliance with all applicable laws.

When you access this Website, you understand and acknowledge that we may transfer, process, and store information about you in the United States and other countries, both within and outside of the European Economic Area. By providing us with your information, you consent to the transfer to, and to the processing and storage of your information in, countries outside of your country of residence, which may have different data protection laws than those in the country in which you reside.

Modifications to this Policy

Any changes we may make to our Privacy Policy will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy. If you do not agree or consent to these updates or changes, do not continue to use our Website. If we make a material change to this Privacy Policy, we will provide appropriate notice to you.

In addition to this Privacy Policy, there may be specific campaigns or promotions which will be governed by additional privacy terms or policies. We encourage you to read these additional terms or policies before participating in any such campaigns or promotions as you will be required to comply with them if you participate. Any additional privacy terms or policies will be made prominently available to you.

Branded Credit Card Privacy Policy

This Policy does not govern the collection or use of the information provided in connection with our branded credit cards. We notify our charge account holders of our privacy practices annually, or as otherwise required by law. If you have one of Signet's branded credit cards, a separate privacy policy provided to you describes collection, use, and protection of information about you and your account.

Privacy & Data Security

Signet's Chief Information Security and Privacy Officer is Scott Lancaster. Scott oversees Signet's information risk and compliance, enterprise data security, customer data privacy, enterprise IT risk management, global information security, internal cyber investigations, and cyber crisis response management.

Signet Jewelers requires all employees to complete a privacy, security, and confidentiality training and awareness program titled Information Security and Privacy Awareness Training. The Information Security and Privacy Awareness Training is a part of the new hire orientation process and is available on the Company intranet. Tracking of participation is captured and audited annually. The training module serves to shape employees' perceptions about information protection to help create a responsible, compliance-minded workforce that is knowledgeable about privacy and information security policies.

Signet's Chief Information Security and Privacy Officer reports to the Board of Director's Audit Committee quarterly. Independent audits are conducted annually.

How to Contact Us

If you have any questions or concerns about this Privacy Policy or the practices described herein, please [contact us](#) or send mail to:

Signet Jewelers - California Privacy Rights
Legal Department
375 Ghent Road
Akron, OH 44333

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